

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

DAVID JONES	*	CIVIL ACTION NO. 6:21-CV-0083
	*	
VERSUS	*	JUDGE JUNEAU
	*	
LEGACY MANAGEMENT GROUP OF	*	MAGISTRATE JUDGE CAROL B.
LOUISIANA, LLC ET AL	*	WHITEHURST
	*	

**DEFENDANTS' MOTION FOR LEAVE
TO FILE REPLY MEMORANDUM TO
PLAINTIFF'S OPPOSITION TO MOTION TO DISMISS**

NOW INTO COURT, through undersigned counsel, come Defendants LEGACY MANAGEMENT GROUP OF LOUISIANA, LLC ("Legacy") and DAVID LALANDE ("Lalande") (together, the "Defendants") who, pursuant to this Court's Notice of Motion Setting Without Oral Argument (R. Doc. 8), respectfully move this Court to grant Defendants leave to file the attached proposed Reply Memorandum to Plaintiff's Opposition to Motion to Dismiss (R. Doc. 12). Defendants show that to adequately address multiple issues raised in Plaintiff's Opposition, it was necessary for Defendants to file a Reply Memorandum.

WHEREFORE, defendants, LEGACY MANAGEMENT GROUP OF LOUISIANA, LLC and DAVID LALANDE , pray that this Motion for Leave to File Reply Memorandum to Plaintiff's Opposition to Motion to Dismiss be granted.

Respectfully submitted,

GOLD, WEEMS, BRUSER, SUES & RUNDELL

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**ATTORNEYS FOR DEFENDANTS, LEGACY MANAGEMENT
GROUP OF LOUISIANA, LLC D/B/A LEGACY NURSING &
REHABILITATION OF FRANKLIN AND DAVID LALANDE**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 3rd day of May 2021, I electronically filed the foregoing with the Clerk of Court via the CM/ECF system which will send notice of electronic filing to all known counsel of record who are participants.

/s/ Sarah Spruill Couvillon
Sarah Spruill Couvillon